

1 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
 2 Claude M. Stern (Bar No. 96737)
 claudestern@quinnemanuel.com
 3 Evette D. Pennypacker (Bar No. 203515)
 evettepennypacker@quinnemanuel.com
 4 Andrea Pallios Roberts (Bar No. 228128)
 andreaproberts@quinnemanuel.com
 5 555 Twin Dolphin Drive, Suite 560
 Redwood Shores, California 94065-2139
 Telephone: (650) 801-5000
 6 Facsimile: (650) 801-5100

7 Attorneys for Defendants The Walt Disney
 Company, Walt Disney Pictures, Disney Book
 8 Group, LLC, Pixar, and Disney Enterprises, Inc.

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 OAKLAND DIVISION

12 Deborah J. Thomas,

13 Plaintiff,

14 vs.

15 The Walt Disney Company, Walt Disney
 Studios, Disney Press, Pixar Animation
 16 Studios, Walt Disney Feature Animation, Walt
 Disney Pictures, Disney Enterprises, Inc., and
 17 DOES 1 through 100, Inclusive,

18 Defendants.

CASE NO. 07-CV-04392 CW

**STIPULATION AND [PROPOSED]
 ORDER REGARDING DEFENDANTS'
 MOTION TO DISMISS PLAINTIFF'S
 FIRST AMENDED COMPLAINT AND
 DISCOVERY SCHEDULE**

19
 20 WHEREAS, Plaintiff filed a First Amended Complaint on October 31, 2007;

21 WHEREAS, Defendants filed a Motion to Dismiss Plaintiff's First Amended Complaint on
 22 November 15, 2007;

23 WHEREAS, Defendants' Motion to Dismiss Plaintiff's First Amended Complaint is
 currently scheduled to be heard on December 20, 2007 at 2:00 p.m.;

24 WHEREAS, Plaintiff's counsel is not available on the noticed hearing date, and the parties
 25 agreed to continue the hearing on Defendants' Motion to Dismiss Plaintiff's First Amended
 26 Complaint to January 31, 2008 at 2:00 p.m.;

WHEREAS, the parties have not previously sought a continuance of the hearing date on Defendants' Motion to Dismiss Plaintiff's First Amended Complaint;

WHEREAS, the parties further agreed not to undertake discovery in this matter until the Court issues an order resolving Defendants' Motion to Dismiss Plaintiff's First Amended Complaint;

NOW THEREFORE, IT IS HEREBY STIPULATED, by and between the parties through their counsel of record, that:

- The hearing on Defendants' Motion to Dismiss Plaintiff's First Amended Complaint is continued to January 31 , 2008 at 2:00 p.m. in this Court;
 - Plaintiff's response to Defendants' Motion to Dismiss Plaintiff's First Amended Complaint and Defendants' reply in support thereof shall be filed in accordance with this Court's Local Rules; and
 - The parties shall not undertake any discovery in this matter until after this Court issues an order on Defendants' Motion to Dismiss Plaintiff's First Amended Complaint.

DATED: November 21, 2007

ROBINSON & WOOD, INC.

By /s/ Archie S. Robinson
Archie S. Robinson
Attorneys for Plaintiff Deborah J. Thomas

DATED: November 21, 2007

QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP

By /s/ Evette D. Pennypacker
Evette D. Pennypacker
Attorneys for Defendants The Walt Disney
Company, Walt Disney Pictures, Disney Book
Group, LLC, Pixar, and Disney Enterprises, Inc.

Order

Pursuant to the foregoing stipulation between the parties, IT IS SO ORDERED.

DATE: _____

United States District Judge

Signature Attestation

2 I hereby attest that Plaintiff's counsel, Archie S. Robinson, read and agreed to the above
3 **STIPULATION AND [PROPOSED] ORDER REGARDING DEFENDANTS' MOTION TO**
4 **DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT AND THE PARTIES'**
5 **DISCOVERY SCHEDULE** and gave Quinn Emanuel permission to sign and file the stipulation
6 on his behalf.

7 | DATED: November 21, 2007

QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP

By /s/ Evette D. Pennypacker

Evette D. Pennypacker
Attorneys for Defendants The Walt Disney
Company, Walt Disney Pictures, Disney Book
Group, LLC, Pixar, and Disney Enterprises, Inc.